

CLERK
U.S. BANKRUPTCY COURT
UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Return Date:

4/11/18
3:30

In re:

2018 FEB 16 P 4:45X

WANDA CONTI

Case No.
Chapter

15-40163

Debtor(s)

11

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed application of

WANDA CONTI, a hearing will be held before the Hon.

CARLA CRAIG, Bankruptcy Judge, to consider the motion for an Order granting relief as follows:

REOPENING CASE WHICH WAS INITIALLY FILED ON JAN 15, 2015 IT INCLUDED PROPERTY

① 28-05 34TH AVE ② 2111 B V C BROOKLYN (WHICH AGAINST STAY WAS BEING LITIGATED IN FLORIDA (HENCE PMTS SHOULD BE RETURNED) ③ 5V48 3269 48TH ST WHO WAS LENDER FOR 2 PROPERTIES BELONGING TO WANDA CONTI, MR. FRANKEL WAS TOLD ABOUT THAT PROPERTY BUT NEVER INCLUDED IT IN PETITION LENDER AND ATTORNEY HE'D A FRAUDULENT BID TO TAKE POSSESSION OF THAT PROPERTY WHICH FRANKEL NEVER MENTION.

Date and time of hearing:

4/11/18

Location: U.S. Bankruptcy Court

271-C Cadman Plaza East

Brooklyn, New York 11201-1800

Courtroom # 3529, 3 Floor

HE GROSSLY OVER CHARGE HIS RETAINED ATTORNEY IN CLUDE 7 properties but only listed 2 5.

Dated:

2/16/18

Signature

Print name:

WANDA CONTI

Address:

371 24TH ST Suite 300

Phone:

917 417 5066

Email:

ARANI.BAROSHE@gmail.com

HE THEN FILED ANOTHER PETITION IN APRIL, FOR THE 6TH PROPERTY AND CHARGE MORE RETAINER

WE ARE NOT CHRONIC FILERS TO CHEAT SYSTEM OUR NAME NEEDS TO BE CLEARED

①

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

WANDA CONTI

Case No.
Chapter

15-40163

Debtor(s)

APPLICATION IN SUPPORT OF MOTION

TO THE HON. CARLA CRAIG, Bankruptcy JudgeI, WANDA CONTI WITH DAUGHTER CORRECTION CONTI, make this application in

support of my motion for the following relief:

RE-OPEN ORIGINAL
CHAPTER 11 CASE 15-40163
FILED IN GOOD FAITH

In support of this motion, I hereby allege as follows:

MR. FRANKEL MISREPRESENT US
HE TOLD US TO LAUGH AND NOT CRY BECAUSE
WE WERE NOT SURE IF THIS WAS THE WAY
TO SAVE PROPERTIES THAT WERE MISMANAGED
FROM 2009 - 2011 AS A RESULT OF
MOVING OUT OF STATE. MR. FRANKEL
Hired HIS SON TO SHOW US HOW TO DO
OPERATING STATEMENT FOR WHICH HE
CHARGE \$K FOR 1 HOUR WORK. HIS RETURN
WAS TO INCLUDE ALL PROPERTIES REMAINING
AND I LENDER FRAUDULENTLY TRANSFERRED deed
BEFORE FILING

Wherefore, Applicant prays for an Order granting the relief requested.

MR. FRANKEL OMITTED THAT PROPERTY.Dated: 2/15/18

Signature

HE WAS GROSSLY OVERPAID. FURTHER MORE
MOVED THE COURT IN THE WRONG ACCUSATION
SUPPORTED
THAT WE ARE FRIVOLOUS FILERS!
WE ARE NOT - MR FRANKEL

(2)
HAD AN OBLIGATION TO
INFORM US THAT THE
PROPER WAY TO EXERCISE
OUR CONSTITUTIONAL RIGHTS
WOULD HAVE BEEN TO
FILE OBJECTION TO
DISMISSAL AND AN ORDER
TO REOPEN AND GIVE US
OPPORTUNITY TO CLOSE
WITH FUNDING A COMPANY
WHICH WE LOST OVER 50K
IN CLOSING FEES. HE INSTEAD
ASKED US TO FIND OTHER ATTORNEY
TO FILE ANOTHER CASE TO
THE COURT WHICH WE DID, PAID
AND LOST MORE MONEY IN RETAINING
FEES. WE RESPECTFULLY REQUEST
THE ORIGINAL CASE BE REOPENED
TO INCLUDE 15-41582 THIS PROPERTY
WAS LISTED AND INCLUDED IN 1540163